

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

MONIQUE TRENT, ADMINISTRATOR  
OF THE ESTATE OF JESSE TRENT,

Plaintiff,

v.

Civil Action No.: 3:24-cv-00804-JAG

ANTIONETTE IRVING, Individually and as  
Sheriff for the City of Richmond, Virginia, *et al.*,

Defendants.

**MEMORANDUM IN SUPPORT OF  
CONSENT MOTION TO UNSEAL EXHIBIT 1 OF PLAINTIFF’S COMPLAINT**

Defendant Sheriff Antionette Irving (“Sheriff Irving”), by counsel, and pursuant to Local Rule 5, submits this memorandum in support of its consent motion to unseal, and respectfully states as follows:

**INTRODUCTION**

1. Monique Trent, as the Administrator of the Estate of Jesse Trent (“Plaintiff”), filed the Complaint (ECF No. 1) (“the Complaint”) on November 13, 2024. Attached to the Complaint is Exhibit 1 (ECF No. 1-1) (“Exhibit 1”), which Plaintiff describes as “Trent’s autopsy report.” Compl. ¶ 4. Plaintiff filed Exhibit 1 under seal without adhering to the sealing procedures established by the Fourth Circuit or this Court’s Local Rule 5. After the Parties conferred in good faith, Plaintiff consents to unseal Exhibit 1. For these reasons, the Court should unseal Exhibit 1.

**ARGUMENT**

2. The Fourth Circuit requires that motions to seal: (1) provide public notice that allows an opportunity to object to the filing; (2) consider less drastic alternatives; and (3) include

*See Ashcroft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000).

3. “Unless otherwise provided by law, Court rule, or prior order of the Court, no document or portion of a document may be filed under seal unless the filer has complied with the procedures set forth herein.” Local Civ. R. 5(A).

4. Plaintiff did not file a motion to seal to Exhibit 1 as required by the Fourth Circuit in *Ashcroft* or Local Civil Rule 5. After the Parties conferred, Plaintiff consents to the relief sought by Sheriff Irving in the consent motion to seal. For these reasons the Court should unseal Exhibit 1 of the Complaint.

## CONCLUSION

5. For these reasons, Defendant Sheriff Antionette Irving, with the consent of Plaintiff, respectfully requests the Court to unseal Exhibit 1 of the Complaint.

Respectfully submitted,

SHERIFF ANTIONETTE IRVING

By: \_\_\_\_\_ /s/

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*Counsel for Defendant Sheriff Antionette Irving*

## CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of January 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all CM/ECF users.

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